

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PB LIFE AND ANNUITY CO., LTD.,
et al.,¹

Debtors in Foreign Proceedings.

Chapter 15

Case No. 20-12791 (LGB)

(Jointly Administered)

JOHN JOHNSTON and EDWARD
WILLMOTT, as Joint Official Liquidators
on behalf of PB LIFE AND ANNUITY
CO., LTD., as Joint Provisional
Liquidators on behalf of NORTHSTAR
FINANCIAL SERVICES (BERMUDA)
LTD., OMNIA LTD., and PB
INVESTMENT HOLDINGS LTD., and PB
LIFE AND ANNUITY CO., LTD.,
NORTHSTAR FINANCIAL SERVICES
(BERMUDA) LTD., OMNIA LTD., and PB
INVESTMENT HOLDINGS LTD.,

Plaintiffs,

v.

GREGREY EVAN LINDBERG, *et. al.*

Defendants.

Adv. Proc. No. 23-01000 (LGB)

**JOINT MOTION
FOR ENTRY OF JUDGMENT**

Plaintiffs John Johnston and Edward Willmott of Deloitte Financial Advisory Ltd., Bermuda, in their capacity as the Joint Official Liquidators and authorized foreign representatives for PB Life and Annuity Co., Ltd. (in liquidation), and the Joint Provisional Liquidators and

¹ PB Life and Annuity Co., Ltd., Northstar Financial Services (Bermuda) Ltd., Omnia Ltd. and PB Investment Holdings Ltd., foreign Debtors, are Bermuda limited companies which each have a registered address in Bermuda c/o Deloitte Financial Advisory Ltd., Corner House, 20 Parliament Street, Hamilton HM 12, Bermuda, and are Jointly Administered for procedural purposes, by Order of this Court entered on April 2, 2021. [ECF No. 42].

authorized foreign representatives for Northstar Financial Services (Bermuda) Ltd. (in liquidation), Omnia Ltd. (in liquidation), and PB Investment Holdings Ltd. (in liquidation) (collectively, the “Debtors,” and with the JOLs/JPLs, the “Plaintiffs”) and Defendant Christopher Herwig, hereby jointly move the Court to enter a Judgment against Defendant Herwig.

A copy of the proposed Judgment is being submitted to the Court simultaneously herewith as a proposed Order, and for the Court’s convenience, is attached as Exhibit 1. A Consent to Judgment executed by Defendant Herwig, in which he agrees to the terms of the proposed Judgment, is attached as Exhibit 2.

If entered by the Court, the proposed Judgment would determine and end all claims of liability that the Plaintiffs have alleged against Defendant Herwig, with the only remaining issue relating to Defendant Herwig being his compliance with the terms of the Consent to Judgment.

WHEREFORE, for the reasons cited above, the parties respectfully request that the Court grant their Motion and enter the Proposed Judgment set forth in Exhibit 1.

Respectfully submitted, this the 27th day of January, 2025.

/s/ Nicholas F. Kajon

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